

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE REPUBLIC OF KAZAKHSTAN,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	15 Civ. 1900 (ER)
DOES 1-100 INCLUSIVE,	:	
	:	
Defendants.	:	
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NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff the Republic of Kazakhstan, by and through its undersigned counsel, shall take the deposition of the representative(s) of [Respublika] [LLC Media-Consult] knowledgeable about the matters set forth on the attached "Schedule A."

The deposition will commence at 9:30 a.m. on _____, 2015 at the offices of Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, NY 10178 and continue day to day until completed. The deposition will be recorded by videographic and/or stenographic means before a person qualified to administer oaths.

Schedule A

DEFINITIONS

1. The definitions set forth in Local Rule 26.3 of the United States District Court for the Southern District of New York are incorporated herein.
2. Plaintiff. The term “Plaintiff” means the Republic of Kazakhstan.
3. Respublika. The term “Respublika” includes movant Respublika and any owner, employee, predecessor, successor, agent, representative, or other person/s acting on its behalf.
4. LLC Media-Consult. The term “LLC Media-Consult” includes movant LLC Media-Consult and any owner, employee, predecessor, successor, agent, representative, or other person/s acting on its behalf.
5. Complaint. The term “Complaint” means the complaint filed by Plaintiff in this matter on March 12, 2015.
6. Hackers. The term “Hackers” means the persons who hacked into the government computer network of the Republic of Kazakhstan, as well as the Gmail accounts of officials of the government of the Republic of Kazakhstan, and who stole governmental emails and other documents, as described in the Complaint.
7. Hackings. The term “Hackings” means the hacking activity undertaken by the Hackers, namely hacking into the government computer network of Plaintiff, as well as the Gmail accounts of officials of the government of the Republic of Kazakhstan, and stealing governmental emails and other documents, as described in the Complaint.

8. Stolen Materials. The term “Stolen Materials” means the governmental emails and other documents stolen from the Republic of Kazakhstan as a result of the Hackings, as defined in the Complaint.

MATTERS FOR EXAMINATION

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Respublika shall designate and produce for deposition a representative who is able to testify with regard to each of the following matters:

1. Respublika’s and LLC Media-Consult’s knowledge of and relationship to the Hackers.
2. Respublika’s and LLC Media-Consult’s knowledge of and relationship to the Hackings.
3. The circumstances under which Respublika and LLC Media-Consult came to be in possession of the Stolen Materials.
4. The circumstances under which Respublika and LLC Media-Consult came to be in possession of other illegally-obtained materials, including, but not limited to, hacked materials other than the Stolen Materials such as Exhibits 1 and 2 to the Declaration of Jacques Semmelman, dated August 21, 2015.
5. Respublika’s and LLC Media-Consult’s removal of its own posts at Plaintiff’s request during the period May 11, 2015 to June 15, 2015.
6. Respublika’s and LLC Media-Consult’s backdating and reposting of posts previously taken down at Plaintiff’s request.
7. Respublika’s and LLC Media-Consult’s contacts with and relationship with Mukhtar Ablyazov, including any financial relationship at any time.

8. Respublika's and LLC Media-Consult's contacts with and relationship with Muratbek Ketebaev.

New York, New York
_____, 2015

CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP

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